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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New
York non-profit corporation, and WR PROPERTY
LLC, a New Jersey limited liability company,

Civ. No. 3:17-DV-03226

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,
MICHAEL REINA, ROBERT NIXON, HELENE
SCHLEGEL, JEFFREY PURPURO, WILLIAM
CAMPBELL, and KENNETH PIESLAK,

Defendants.

DECLARATION OF DEVORAH GRUSKIN

DEVORAH GRUSKIN declares as follows, pursuant to 28 U.S.C. § 1746:

1. I live at 14 Arizona Avenue in Jackson Township, New Jersey.
2. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
3. I am a member of Agudath Israel.
4. I have two school aged children. I believe that my children must attend a Jewish school where they will be taught our religious laws and traditions in addition to their secular studies. The school must also follow Jewish laws such as laws of *kashrut* (Kosher dietary laws).
5. There is no school in Jackson for my children to attend which furthers my religious beliefs, so they must attend a school in Lakewood. The drive to school usually takes around 1 and 1/14 hours and the drive home usually takes around 45 minutes. School starts at 9 a.m. and my sons are picked up 7:43 a.m.
6. My sons are late almost every day and miss out on prayers and religious studies and are falling behind in learning their prayers and learning to lead prayers, which is a religious obligation that they will have when they are older.
7. If there was a school in Jackson, my sons wouldn't miss out on prayers and religious studies and would be learning their prayers and learning to lead prayers.
8. The ordinances regarding schools do not affect my neighbors whose religious beliefs permit them to send their children to schools in Jackson, but they affect me as an Orthodox Jew.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 7, 2019



DEVORAH GRUSKIN